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July 13, 2023

Via Electronic Filing

The Honorable Judge J. Paul Oetken
U.S. District Court, Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Rathod v. Wellington Physical Therapy and Acupuncture PLLC et al*
Case No.: 1:23-cv-03276-JPO

Dear Honorable Judge Oetken:

This law firm represents Defendants Wellington Physical Therapy and Acupuncture PLLC, and Nikki Yu (together, the “Defendants”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Rules and Practices 1(A) and 3(C), this letter respectfully serves to request an extension of Defendants’ time to reply or otherwise respond to Plaintiff’s Complaint to be extended through and including August 14, 2023.

This is the second request of its nature, and is made on consent of Plaintiff’s counsel. If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that the undersigned counsel has recently been engaged [see Dckt. Nos. 12-13] and requires additional time to gather information from Defendant to respond to the Complaint. It is further stipulated and agreed that Defendant waives any defense to personal jurisdiction due to improper service of process.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel